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December 9, 2014

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of Oral Ex Parte Presentation; WC Docket Nos. 11-42, 09-197, GN Docket No. 14-25**

Dear Ms. Dortch:

On December 5, 2014, John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP, on behalf of multiple clients identified below, met with Diane Cornell, Special Counsel to Chairman Wheeler and Daudeline Meme from Ms. Cornell's office. In February, the Commission released a Report on FCC Process Reform, which "seeks to further the goal of having the agency operate in the most effective, efficient and transparent way possible" and "reduc[e] backlogs."<sup>1</sup> The Commission should apply those goals to the management of the Lifeline program so that Lifeline providers have a stable and predictable regulatory environment and can attract investment necessary to provide low-income Americans with the modern communications services necessary to connect to jobs, healthcare, emergency services and family.

In the meeting, we discussed the role that the Lifeline Connects Coalition ("Coalition") has played in response to the Commission's call for industry support in publicly defending the Lifeline program and promoting its effectiveness. The member companies have developed and distributed materials to use in support of the program, including Myths v. Facts to dispel false rumors regarding the program and testimonials from Lifeline subscribers to highlight the stories of real people that rely on these companies and the Lifeline program to provide access to employers, potential employers, teachers, doctors, nurses and family while they struggle to improve

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<sup>1</sup> FCC Seeks Public Comment on Report on Process Reform, GN Docket No. 14-25, Public Notice, DA 14-199 at 1 (Feb. 14, 2014).

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their economic situation.<sup>2</sup> Further, these companies joined to form the Lifeline Reform 2.0 Coalition in June 2013 to file a petition for rulemaking proposing additional business-plan agnostic reforms to the Lifeline program,<sup>3</sup> which was updated in April 2014.<sup>4</sup> The proposed reforms include process reforms, such as establishing a “shot clock” time period for review and approval of petitions for eligible telecommunications carrier (“ETC”) designation, compliance plans and to complete audits.

We also discussed the commitment these companies and many others that use the CGM, LLC platform have made to combating duplicate enrollments in the Lifeline program, both within each company and between ETCs. For example, the companies represented here joined with dozens of other ETCs that voluntarily utilized an Inter-company Duplicates Database (“IDD”) developed by CGM, LLC that prevented over 375,000 duplicate enrollment attempts and saved the Lifeline program an estimated \$50 million annually. These efforts were undertaken before the development of the Commission’s National Lifeline Accountability Database (“NLAD”) and the IDD blocked inter-company duplicate enrollment attempts while the NLAD was supposed to have been operational (since February 2013). These companies have worked extensively with the Wireline Competition Bureau (“Bureau”) and the Universal Service Administrative Company (“USAC”) to vet and improve the NLAD (including its identity verification component), including by flying in technical advisors from the companies to meet with and assist USAC and its NLAD vendor and through CGM’s consistent efforts to educate the Bureau and USAC on its experience building and operating a duplicates database.

### **The Notices of Apparent Liability and Related Appeals**

The Commission’s rules and orders do not define a “duplicate” for purposes of the one-per-household rule, nor do they define a “subscriber” for purposes of determining whether the subscriber received more than one Lifeline-supported service. Notably, when the Bureau has provided guidance on what it views to represent a duplicate, it has offered something different on no less than four occasions (In-Depth Validation or IDV instructions to USAC, Lifeline Biennial Audits initial proposal, NLAD seeding and in a Public Notice requiring the use of all subscriber data for detecting duplicates).<sup>5</sup> When USAC was asked by CGM on behalf of its clients for the

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<sup>2</sup> The materials are included as an exhibit.

<sup>3</sup> See Lifeline Reform 2.0 Coalition Petition for Rulemaking, WC Docket Nos. 11-42, 03-109, CC Docket No. 96-45 (filed June 28, 2013). The members of the Lifeline Connects Coalition and Lifeline Reform 2.0 Coalition are Telrite Corporation, i-wireless, LLC, Blue Jay Wireless, LLC and Global Connection Inc. of America.

<sup>4</sup> See Lifeline Reform 2.0 Ex Parte, WC Docket No. 11-42 (Apr. 14, 2014).

<sup>5</sup> See *Wireline Competition Bureau Announces Duty to Query the National Lifeline Accountability Database*, WC Docket No. 11-42, Public Notice, DA 14-40 (rel. Jan. 14, 2014) (“NLAD Query Public Notice”).

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duplicate detection methodology used in the IDVs (which clearly diverged from the definition supplied by the Bureau for that purpose), USAC refused to provide it citing purported benefits of keeping secret the standard by which ETCs would be judged and pursuant to which the Commission has selectively proposed more than \$94 million in fines. This is the antithesis of the transparent policymaking sought by the Report on FCC Process Reform.

Despite the lack of clarity regarding duplicate accounts prior to NLAD implementation, the Commission has undertaken a misguided and harmful process of proposing multi-million dollar fines against ETCs for failing to eradicate 100 percent of end-user fraud allegedly perpetrated in the form of intra-company duplicate enrollments in the Lifeline program. How the Commission selected certain ETCs for this treatment and not others remains unknown, which weighs on the agency's credibility. In addition to several other ETCs arbitrarily chosen, Coalition members i-wireless, Telrite, and Global Connection each have received a Notice of Apparent Liability ("NAL"). Each company disputes the allegation of duplicate enrollments, but even if every one of the alleged intra-company duplicates were duplicates, the companies would have near-perfect track records at protecting the program from such duplicate enrollments – i-wireless 99.7 percent, Telrite 99.6 percent and Global Connection 99.4 percent. Other clients, including Assist Wireless 99.6% and Easy Wireless 99.4%, have similar near-perfect records at guessing what USAC and the Commission (often with no investigation of its own) would call a duplicate.

The Commission and USAC appear to expect perfection in guessing what will be deemed to be a duplicate, but these track records at blocking duplicate enrollment attempts are not the sign of ETCs that ignore the Commission's rules or abuse the program by accepting duplicate enrollment attempts by end-users. In fact, if each of our clients were subject to the Improper Payments Elimination and Recovery Act of 2010 threshold for government disbursement programs, none would be considered to be susceptible to "significant improper payments" because the alleged improper payments are less than 1.5 percent.<sup>6</sup> Nonetheless, each ETC that has been arbitrarily selected to receive an NAL has to expend enormous resources defending itself before the Commission and in front of state commissions against allegations that it failed to anticipate perfectly those accounts USAC would deem to be duplicates (despite customer attestations and subscriber information differences the Commission requires ETCs to consider but so far has permitted USAC to ignore).

The companies are pleased that the NLAD is now "live" for real-time enrollment "dips" and is actively screening enrollments for duplicates based on defined fields – exact last name, date of birth and last four digits of SSN, but no process can be perfect and perfection should not be expected. USAC has already announced that it has recently "identified subscribers that must

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<sup>6</sup> See *Improper Payments Elimination and Recovery Act of 2010*, P.L. 111-204 (Jul. 22, 2010, 31 U.S.C. § 3321).

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undergo a duplicate subscriber resolution process to address duplicate enrollments that were not resolved during the NLAD migration process.”<sup>7</sup> USAC and the Bureau appear to be discovering that duplicate detection is a difficult and iterative process, which is all the more reason that ETCs should not be held to a standard of perfect compliance with an unknown standard with the risk multi-million dollar proposed fines hanging in the balance.

The NALs have now been pending for approximately one year, as have many IDV appeals and USAC continues to apply the unknown duplicate standard in Payment Quality Assurance (“PQA”) assessments, which require ETCs to file additional appeals. This process has resulted in confounding results offensive to notions of sound governance, due process, efficiency and transparency. As an example, several ETCs have received NALs for audit findings that had not been issued by USAC and several ETCs have received NALs for audit findings that are on appeal before the Bureau. Further, some appeals now have been pending beyond the deadlines set by the Commission for acting on them.<sup>8</sup> Although i-wireless, Telrite, Assist Wireless, Easy Wireless and Global Connection filed requests for review on December 30, 2013 and the 90 day deadline was on March 30, 2014, the companies received no notice that the time period for taking action had been extended. We subsequently learned that the period had been extended, but that extended deadline has long since passed with no action by the Bureau.

### **Compliance Plans and Federal ETC Petitions**

The process issues related to Lifeline extend beyond the enforcement and audit contexts. The Lifeline program and its beneficiaries would be well served by the adoption of an improved governance framework. The database solutions (i.e., the duplicates database that was delivered late and the eligibility database that was due by the end of last year and a delivery date appears uncertain) that all stakeholders declared essential to preserving the integrity of the Lifeline program and reform proposals such as the Lifeline Reform 2.0 Petition are not the only items the Commission has permitted to languish. Federal ETC applications and compliance plan approvals have been left pending beyond the point of reasonable expectation. For the Lifeline program to remain viable, and to reach its full potential, all players in the Lifeline ecosystem, including regulators, consumers and service providers – must do their part. While we regularly have praised the Commission’s actions, we also have been candidly critical of its missteps and respectfully have submitted proposed solutions. Here, the Coalition submitted a proposal in its April 2014 Lifeline

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<sup>7</sup> NLAD Bulletin: New Production Duplicate Subscriber Resolution Process (Dec. 1, 2014), available at <http://www.usac.org/li/tools/news/default.aspx> (last visited Dec. 9, 2014).

<sup>8</sup> See 47 C.F.R. § 54.724 (“The Wireline Competition Bureau shall, within ninety (90) days, take action in response to a request for review of an Administrator decision that is properly before it. The Wireline Competition Bureau may extend the time period for taking action on a request for review of an Administrator decision for a period of up to ninety days.”).

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Reform 2.0 filing designed to provide a level of governance, accountability and regulatory certainty essential to the success of the Lifeline program and its inevitable progression to broadband.<sup>9</sup>

The Communications Act charges the states with designating ETCs,<sup>10</sup> however, several states do not regulate wireless services and do not wish to designate wireless ETCs, so they have passed the designation responsibility back to the Commission.<sup>11</sup> In addition, the Commission's *Lifeline Reform Order* granted blanket forbearance from the requirement that ETCs provide service using, at least in part, their own facilities, conditioned on approval of a compliance plan describing how the ETC (or prospective ETC) would comply with the Commission's new requirements.<sup>12</sup>

According to the Commission's website that tracks Lifeline petitions for ETC designation in the federal jurisdiction states and compliance plans, there are 39 federal ETC petitions and 57 compliance plans pending with the Bureau for action.<sup>13</sup> Many of the federal ETC petitions have been pending for years, including Boomerang's which has been pending since 2010; TAG Mobile's which has been pending since 2011; Telrite's, Global Connection's, Blue Jay's, NewPhone's, LTS of Rocky Mount's and TX Mobile's that have been pending since 2012; and Assist Wireless' and Pinnacle Telecommunications Group's that have been pending since 2013. The same can be said with respect to compliance plans with many, including Absolute Home Phones, Inc., Aegis Telecom, Inc. Affordable Phone Services, Inc., Assist Wireless, Easy Wireless, Global Connection Inc. of America (wireline), Gulf Coast Home Phone Service, Head Start Telecom, LTS of Rocky Mount, NewPhone Wireless, Pinnacle Telecommunications Group, TX Mobile and others pending since 2012. The Bureau has not approved a compliance plan since December 2012 or a federal ETC petition since August 2012.<sup>14</sup> These delays have artificially

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<sup>9</sup> This transition will require significant private investments in healthy ETCs.

<sup>10</sup> See 47 U.S.C. § 214(e)(2).

<sup>11</sup> See 47 U.S.C. § 214(e)(6).

<sup>12</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice Of Proposed Rulemaking, FCC 12-11, ¶368 (Feb. 6, 2012) ("*Lifeline Reform Order*").

<sup>13</sup> See <http://www.fcc.gov/encyclopedia/lifeline-compliance-plans-etc-petitions> (last checked Mar. 31, 2014). It is a near certainty that a number of these filings have been abandoned as investors and job creators could not tolerate the regulatory uncertainty created by the Commission's effectively having put on hold these items for as many as four years.

<sup>14</sup> The Bureau did approve the federal ETC designations of a small facilities-based regional carrier, Buffalo-Lake Erie Wireless Systems Co., L.L.C. for service in certain areas in New York and SI Wireless, LLC a small facilities-based wireless provider in Tennessee on November 26, 2014.



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restricted competition among ETCs for Lifeline customers in all states, but especially in the twelve federal jurisdiction states. Restricting competition reduces the incentive to improve the Lifeline benefit for low-income consumers. The Commission should take prompt and decisive action to change course and to let markets and consumers pick winners and losers.

More recently, the Bureau has announced that any “material” changes to an approved compliance plan, including changes in corporate ownership and control, must be pre-approved by the Bureau.<sup>15</sup> A “reminder” that announces new requirements that render null language in a better than two-year old FCC order provides ample material for a case study in process reform. With no guidance on what constitutes a material change and no clue as to how long the Bureau would take to review and approve such changes, this action provides another striking example where the Commission has created and fueled regulatory uncertainty to the detriment of willing service providers and the low-income consumers they seek to serve.<sup>16</sup>

As the Commission has recognized previously,<sup>17</sup> the regulatory certainty created by establishing predictable decision timelines is essential to maintenance of adequate investment in the markets it oversees and regulates. For those same reasons and mindful of the need for private capital to support the transition of Lifeline to broadband, the Commission should adopt “shot clock” deadlines for the Bureau and itself to act on federal ETC petitions and compliance plans. If no action is taken within 90 days of filing a federal ETC petition, it should be automatically granted. If no action is taken within 90 days of filing a compliance plan, it should be automatically approved. We are mindful that the Commission has many priorities and finite resources, therefore, consistent

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<sup>15</sup> See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (rel. July 24, 2014) (“Compliance Plan Change Public Notice”).

<sup>16</sup> Ironically, the Commission’s lack of action on pending ETC applications and compliance plans and the nearly inscrutable footnote 1000 and the Compliance Plan Change Public Notice have largely blocked industry consolidation. Footnote 1000 of the *Lifeline Reform Order* states, “In the event there is a change in ownership control of an existing Lifeline-only ETC that received forbearance of the facilities-based requirement, designated prior to December 29, 2011, and that Lifeline-only ETC is acquired by a telecommunications carrier that does not meet the definition of a facilities-based carrier under section 214(e)(1)(A), the controlling carrier may not rely on the existing Lifeline-only ETC’s compliance plan and must submit a compliance plan for Bureau approval....” *Lifeline Reform Order*, n. 1000. The Compliance Plan Change Public Notice takes that to mean “the approval of a compliance plan is limited to the entity, and its ownership, as they are described in the compliance plan approved by the Bureau, and any material changes in ownership or control require modification of the compliance plan that must be approved by the Bureau in advance of the changes.” Compliance Plan Change Public Notice at 2.

<sup>17</sup> See 47 C.F.R. § 54.724.

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with the framework of Section 54.724, the Commission should have the ability to extend this deadline through public action by up to 90 days.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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cc: Diane Cornell  
Daudeline Meme

# EXHIBIT





## **Blue Jay Wireless, LLC**

Blue Jay Wireless, LLC is an eligible telecommunications carrier (ETC) headquartered in Addison, Texas near Dallas. Blue Jay was formed in March 2012, employs approximately 50 full time employees and 300 agents nationally and is authorized to provide Lifeline services in 16 jurisdictions: Arizona, Colorado, Hawaii, Kentucky, Michigan, Minnesota, Missouri, Nevada, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Wisconsin and Utah. We intend to expand nationwide.

Blue Jay is a prepaid wireless telecommunications company that targets the under-banked and low-income consumer demographic in the United States with both Lifeline and non-Lifeline services. Blue Jay was founded on the belief that everyone should have access to the safety and convenience of wireless service. Blue Jay provides affordable prepaid wireless service including basic voice and text services with options for data upgrades all on nationwide networks. Blue Jay's products and plans are specifically geared toward serving lower income communities (including lower income Spanish speaking communities) as reflected by its service models, pricing plans and bilingual customer service support. Blue Jay has an established track record of working within the communities it serves to create jobs and provide employment opportunities to those who need them the most. As an example, to date, Blue Jay has employed over 20 people from the Samaritan Inn, the largest homeless shelter in Collin County Texas, who have graduated from homelessness to employment.

### **Blue Jay Lifeline beneficiaries tell their stories about transitioning to employment:**

"I had been struggling to find work before I received my Blue Jay Wireless phone. I had no number to put on my applications and had to tell potential employers that I did not have a phone. Once I obtained the phone, I updated my resume to include my number and immediately started receiving calls back. Within one month, I obtained full-time employment. Thank you Blue Jay Wireless for helping me and my family!" (Denise)

"I was introduced to Blue Jay Wireless in 2013 while residing at the Samaritan Inn.\* I was brought on as a temporary employee and was offered a full-time position one week later. I could tell immediately that I was embarking upon something special. The company has renewed my confidence in the old saying "hard work pays off." I am looking forward to being part of the team for years to come!" (Jeremy)

"I became a customer of Blue Jay when my family and I fell on hard times and had to enroll in SNAP. The service was a godsend as we could no longer afford the monthly payments we were making for our existing prepaid service. After being hired as a Blue Jay agent, I have been able



to support my family. And now I get the opportunity to make a difference in someone else's life by providing others in need with affordable phone service!" (Jerardo)

"I applied for a job with Blue Jay through Larimer County Workforce in Colorado. I was attending Employment First job training where Blue Jay presented their Lifeline service offerings for qualified customers. What I enjoy most about working for Blue Jay is having the opportunity to meet and hear the stories of so many people from diverse backgrounds whose lives will be improved by having this phone service." (Greg)



## Overview of who we are and what we do:

Global Connection Inc of America, of Norcross GA, was founded in 1998. We have approximately 110,000 wireless and 20,000 wireline customers. Our wireline brand is Real Home Phone and our wireless brand is Stand Up Wireless. We currently employ 55 people, and, through partners, support another 45 US jobs. We currently serve customers in twenty nine states: Alabama, Arizona, Arkansas, Colorado, Florida, Georgia, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Massachusetts, Michigan, Minnesota, Mississippi, Missouri, Nebraska, North Carolina, Ohio, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Tennessee, Texas, Utah, West Virginia and Wisconsin.

Our Wireless and Wireline  
phone service brands



## GCIOA stands out in several important ways:

- We are one of the few Lifeline providers that offer customers a choice between home phone and wireless service, depending on their unique needs.
- We take pride in our "A" rating from the Better Business Bureau.
- To better serve our customers, we utilize American based call centers, providing dozens of U.S. jobs.
- Stand Up Wireless believes it is critical to integrate closely with the communities it serves and has instituted a "For the community, In the community, With the community" strategy. In support of that, we established company branded, brick and mortar locations in multiple states including Arizona, Georgia, Louisiana, Maryland, Ohio, Pennsylvania and Wisconsin. In addition to providing local employment, these outlets allow for face-to-face customer sales and service. We have found that this environment is especially valuable to our more senior customers as they benefit from hands on instruction on how to best use our products.
- Global understands that customers' requirements are continually evolving and that Internet access is a critical, and growing, need. That is why we are launching new data-enabled prepaid products through a network of up to 20,000 retail locations in lower income areas. On all of the products, eligible consumers will be able to apply Lifeline discounts after appropriately enrolling in the program. Under this program, customers will be able to purchase an Internet enabled smartphone for \$45.00 and have voice, text and data service for as low as \$7.95 per month (plus tax and after the Lifeline discount).
- Global is the proud sponsor of the holiday food drives and sports and dance teams of Omaha, Nebraska's Wakonda Elementary School (Go Wildcats!), inner-city basketball in Atlanta, the Gwinnett County Georgia Latino Food Drive and Cultural Expo and Autism Speaks in Philadelphia.



**Lifeline makes a difference  
in our customers' lives**



"I became a StandUp customer in February of 2013. I am delighted with the service. My two grandsons have asthma. More than once the pre-K or elementary school has called me on my StandUp phone to alert me that the asthma was acting up so I could take them home to their machine that provides breathing treatments. That would not have been possible in the year before receiving my Lifeline phone as I did not have phone service."



"Well, StandUp Wireless has helped me out a lot. I enrolled into school at AIU taking up Criminal Justice and my StandUp phone helped me complete the process. I have also been able to keep up with my children's doctor, dentist, etc appointments."



## Our retail locations





i-wireless LLC (doing business as Access Wireless) is an eligible telecommunications carrier (ETC) headquartered in Newport, Kentucky, just outside of Cincinnati, Ohio. The Company provides wireless service in all fifty States and is an approved ETC for the Lifeline program in 34 states and the District of Columbia. i-wireless serves approximately 882,000 Lifeline customers nationwide.

Founded in 2005, i-wireless activated its first customer in 2006, and received its first Lifeline ETC designation in 2011. The company directly employs 65 full-time and 20 part-time/contract staff. In addition, our outsourced call center, IT, compliance and accounting vendors employ the equivalent of 110 full-time employees on our behalf.

As a subsidiary of The Kroger Company, the nation's largest traditional grocery retailer, i-wireless is uniquely positioned to serve the needs of a large population of Lifeline-eligible Americans.

Operating 2,638 grocery stores across 34 states and hundreds of small communities, Kroger serves millions of customers that are participants in other entitlement programs, with a strong concentration in both the Supplemental Nutrition Assistance Program (SNAP) and Medicaid programs. Educating these customers about the availability of Lifeline and then providing them with a convenient method of securing the service is a valuable public benefit and a distinct competitive advantage.

The company is strongly determined to provide its customers with the highest-quality Lifeline experience, and it does so by adding value in ways unique to our core grocery retailing relationship. As an example, today this includes providing free and discounted food as a reward for loyalty, loaded in the form of an electronic coupon on the customer's loyalty card and redeemable in-store.

In the future we intend to expand upon this experience, providing our Lifeline customers with access to expanded nutritional information, proprietary grocery savings and free samples, and discounts or free access to a number of other related categories (including fuel, education, financial planning and services, and healthcare).



## **Access Wireless Lifeline beneficiaries tell their stories about:**

**Getting a job.** “I’m a young Army veteran and a single father. I joined the service when I was 19 as a way to provide for my family. I’ve served for 6 years including tours in South Korea, Japan, Germany and Afghanistan. I income-qualify for Lifeline service. Since returning home, I’ve settled in a remote area of Nevada. I find occasional work as a freelance mechanic, but am struggling to find full-time employment. I use my Lifeline phone on my resume when applying for jobs and as a way to keep in touch with my family members that live far away.” (Brian S., Nevada)

**Keeping a job and coordinating childcare.** “I’m a single Mom. My son’s father died of a drug overdose and I’m [on] my own trying to support my little boy and I. I work part-time in a call center and rely on family members to help me with childcare. When I get the chance to work overtime and make more money, I use my Lifeline phone to call friends or family and ask for additional help in watching my son. We need the extra money, so it’s important that I don’t pass up those opportunities to earn some extra cash.” (Amy R., Kentucky)

**Serving clients.** “I used to work in a beauty shop, but I couldn’t afford the rent any longer so now I cut hair out of my apartment. My clients need a way to contact me to schedule appointments. I rely on my Lifeline phone so that they can reach me. If they call and I’m not available, they’ll go somewhere else.” (Charlene P., Arizona)

**Emergencies.** “I am a single Mom of four boys. I have used my Lifeline phone to call 911 on two separate occasions. Once when a field next to our home caught fire and once when my 6-year old had a fishing lure hooked in his leg. I was able to quickly call for the paramedics. I’m so thankful to have my Lifeline phone.” (Juanita E., Tennessee)

“I called 911 from my Lifeline phone because my friend went into a diabetic coma. She was rushed to the hospital and in ICU for over a week.” (Melissa E., Georgia)

**Healthcare.** “I have a fixed income and can barely afford to pay for my medication every month. My daughter lives out of town and my Lifeline phone is the only way that I have to stay in touch with her. I also use it to make my doctor’s appointments and get my prescriptions refilled at the pharmacy.” (Henry T., Colorado)

**Family.** “I am an elderly caregiver and am trying to pursue an education while balancing a full-time job and the needs of a family. Having a Lifeline phone allows me to check in to make sure my son got off the school bus okay and made it home safely. I can also check in to make sure that my ailing mother is doing ok.” (Charese M., Indiana)

“I am a single Mom with three kids. My ex-husband does not pay child support and I am solely responsible for taking care of our children. I clean houses and offices to make a living, but I need to know where my kids are and that they are okay when I’m working.” (Carol S., Colorado)



## **Telrite Corp.**

Telrite Corp. (doing business as Life Wireless) is an eligible telecommunications carrier (ETC) headquartered in Covington, Georgia. Established in 2010, Telrite employs 503 people. Under our Life Wireless brand, we provide Lifeline services in 29 jurisdictions – Arizona, Arkansas, Colorado, Georgia, Illinois, Indiana, Iowa, Kentucky, Louisiana, Kansas, Maine, Maryland, Michigan, Minnesota, Missouri, Nevada, North Dakota, Ohio, Oklahoma, Pennsylvania, Puerto Rico, Rhode Island, South Carolina, Texas, Utah, Vermont, Washington, West Virginia and Wisconsin. Life Wireless serves approximately 620,000 Lifeline customers nationwide.

Life Wireless' mission is to drive awareness and availability of the Lifeline program to underserved markets across the U.S., in order to reach those most in need of affordable phone service. Our field representatives organize sales events in the community, often partnering with local nonprofit organizations, helping Life Wireless reach Lifeline-eligible populations overlooked by other Lifeline companies that rely predominantly on advertising (internet, outdoor, mail, etc.) to attract eligible subscribers.

Life Wireless is proud to be a part of the Lifeline program and help those most in need stay connected to loved ones, employers, medical providers, and emergency service providers. Life Wireless is committed to preserving the integrity of the Lifeline program and has been an industry leader on compliance issues. For example, the company has developed a gold standard for training and compliance, including mandatory training for field representatives through Life Wireless University, real-time monitoring of all enrollment locations and activity for any anomalies, and unscheduled photo audits of enrollment locations to ensure proper placement of required disclosures and orderly appearance of the enrollment site and field representatives.

Life Wireless has attended 12 Hiring Our Heroes events across 8 states in 2014. Hiring Our Heroes, a program of the U.S. Chamber of Commerce Foundation, was launched in March 2011 as a nationwide initiative to help veterans, transitioning service members, and military spouses to find meaningful employment opportunities. In addition to Hiring for Heroes, Life Wireless actively works with the Goodwill of North Georgia and its First Choice Veterans employment program to staff its Marietta, GA network operation and customer service centers. Life Wireless currently has over 30 veterans on its active field representative roster.

### **Life Wireless Lifeline beneficiaries tell their stories about:**

**Getting a Job.** "I have a 2 year old son and I am currently expecting my second child. I am also taking care of my mother. Recently I have been searching for a job. Before I had this phone I would have to write down contact numbers of family and friends on job applications in hopes that potential employers would somehow be able to contact me. Within just a few short weeks of receiving this



phone I was able to retain employment. Without this phone, it would not have been possible to get this job and help support my family. I am extremely grateful for this service.” (Brandy W.)

“This is very helpful without my phone I could not make the phone calls to inquire about employment. I just received a call about an hour ago from an employer to schedule me for an interview. Without this phone that would not have been possible. This service has been very helpful. This phone is a blessing.” (Edward B.)

**Healthcare.** “This has helped a lot with doctors for me and my husband. My husband has blood issues and I am a diabetic. It has helped me be able to talk to the doctors and make appointments for me and my husband. He has to go to the doctor several times a week for blood thinning medicine. We are both looking for a job right now so this cell phone helps with that too. I would not be able to talk to my doctor if it weren’t for this phone.” (H. Rodriguez)

“I use my lifeline to make doctor appointments and to help with my 78 year old grandmother. My grandmother suffers from arthritis. She fell just the other day and she was able to call me on my phone so that I could come over and help her get back up. This phone also allows me to communicate with my children so that I know they are all safe.” (Shandia S.)

**Veteran’s Care.** Tim is a six-year veteran of the U.S. Air Force who is now wheelchair-bound after suffering from Lyme disease. He uses his Life Wireless phone to stay connected in case of emergencies and remain an active member of his community. “Before I had the phone, I would be stranded without communication if something was to go wrong and I was away from home. Regular cell phone plans are so expensive they are beyond my reach, but the Life Wireless phone keeps me rolling,” says Tim. “It’s become a link for me to live a higher quality life. I’m a much more active member of my community than I was before I had the Life Wireless phone.” (Tim H.)

**Emergencies.** Maria, a single mother from Chicago, used her Life Wireless phone to call 911 when she was assaulted. She credits the phone with saving her life. She also used the phone to contact a domestic violence center, where she found safe temporary housing. “There are two single mothers at the Rescue Center where I am staying that have do not own cell phones,” she said. “We are going to help them get a Lifeline phone for their safety in emergency situations also. I strongly believe this program.” (Maria R.)

“We had a family emergency. My daughter went into premature labor and had to deliver my grandson via emergency C Section at 29 weeks. He was born weighing 3lbs 8oz so he is in the NICU. Having this phone has allowed me to be able to communicate with my daughter while she was in the hospital, stay informed on the progress of my grandson and arrange for my granddaughter to be cared for while her mother is with my grandson in the hospital. We live in separate cities so communicating over the phone is very important. Having this phone makes it possible for our family to connect and create [a] strong support system for each other during this difficult time.” (Margerei B.)

## **Telrite, i-wireless, Blue Jay Wireless and Global Connection: Working Together to Preserve the Integrity of the Lifeline Program**

### **What is Lifeline?**

A Universal Service Fund program established by the FCC in 1985, and expanded to wireless in 2005, to make phone service more affordable for low-income Americans. Eligible Telecommunications Carriers (ETCs) receive disbursements from the FCC for service provided to beneficiaries (\$9.25/month/person).

### **Who is eligible for Lifeline?**

Recipient must meet the following criteria:

- Income at or below 135 percent of the federal poverty guidelines, or
- Participation in federal assistance programs such as Medicaid, Supplemental Nutrition Assistance Program (SNAP), Social Security Income (SSI), Federal Public Housing Assistance, Temporary Assistance for Needy Families (TANF), National School Lunch Program, or Bureau of Indian Affairs General Assistance.

### **What has the FCC done to reform Lifeline?**

In February 2012, the FCC adopted a major package of reforms designed to address concerns over waste, fraud and abuse of the Lifeline program. The "Lifeline Reform Order" requires:

- Proof of eligibility verification
- Creation of a federal "duplicates" and eligibility databases
- Customer certification acknowledging the one per household rule
- Use it or lose it requirement for certain wireless subscribers
- Annual recertification of eligibility
- Additional auditing of new and large ETCs

FCC estimates reforms saved \$214 million in Lifeline disbursements in 2012 and projected additional savings of \$400 million in 2013.

Today, approximately 14.2 million subscribers are enrolled in Lifeline representing a penetration rate of approximately 38% and total annual disbursements of approximately \$2 billion.



## What is industry doing to preserve the integrity of the Lifeline program?

**Lifeline Connects** is a coalition of ETCs that have joined together to preserve the integrity of the Lifeline program through education and engagement with policymakers and the public. The coalition has highlighted the program's effectiveness in connecting veterans, the elderly, single mothers and other low-income Americans to job opportunities, healthcare providers, schools and emergency services.

- We go above and beyond FCC rule requirements and USAC audits to screen for and block duplicate enrollment attempts by unscrupulous individuals seeking to obtain more than one Lifeline benefit.
- Prior to the implementation of the FCC's national duplicates database, we voluntarily participated in a CGM-created pre-enrollment Intercompany Duplicates Database (IDD) that blocked more than 375,000 suspected duplicate enrollment attempts, saving the USF an estimated \$50 million annually.
- In June 2013, we filed a petition with the FCC proposing further reforms to the Lifeline program. Due to regulatory and market changes that have occurred since that time, we filed a revised list of proposals in April 2014, which includes six core measures that should be the centerpiece of further Lifeline reform:
  - Retaining copies of eligibility documentation;
  - Establishing minimum standards for state Lifeline eligibility databases similar to the minimum standards that the FCC established for state duplicates databases;
  - Establishing a safe harbor from enforcement action for alleged duplicate enrollments for any Lifeline subscribers that have been submitted to the national duplicates database or a similar state database;
  - Requiring non-commission based review and approval of enrollments regardless of where the enrollment takes place;
  - Establishing a "shot clock" time period for FCC review and approval of petitions for ETC designation, compliance plans and to complete audits; and
  - Allowing wireless reseller ETCs to define service territory based on zip codes of underlying carrier coverage and disassociating wireless ETC service territory from wireline carrier territories like exchanges and wire centers.

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November 17, 2014

Marlene Dortch, Secretary  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

**Re: Notice of Lifeline Connects Coalition Oral *Ex Parte* Presentation;  
WC Docket Nos. 11-42, 09-197**

Dear Ms. Dortch:

On November 13, 2014, Brian Lisle and Susan Berlin of Telrite Corporation, Jeni Kues of i-wireless, LLC, Dave Skogen of Global Connection of America Inc., Jaime Palmer and Lauren Moxley of Blue Jay Wireless, LLC, Chuck Campbell of CGM, LLC and John Heitmann and Joshua Guyan of Kelley Drye & Warren LLP met with Ryan Palmer, Jonathan Lechter, and Melanie Tiano of the Wireline Competition Bureau (“Bureau”). The companies represented are the members of the Lifeline Connects Coalition that have joined together to protect and preserve the integrity of the Lifeline program by educating and separating myths from facts about the program, sharing best practices on compliance and industry self-regulation, and by proposing additional reforms dubbed “Lifeline Reform 2.0” to the FCC in a petition for rulemaking filed last year and updated in April 2014.<sup>1</sup>

In the meeting, we discussed Commissioner Clyburn’s speech<sup>2</sup> delivered at an event entitled “Reforming Lifeline for the broadband era” at the American Enterprise Institute on November 12, 2014.<sup>3</sup> The Coalition supports Commissioner Clyburn’s goal of modernizing the Lifeline program for the broadband era. Today’s Lifeline program does not do enough to make

<sup>1</sup> See Lifeline Reform 2.0 *Ex Parte*, WC Docket No. 11-42 at 5-9 (Apr. 14, 2014).

<sup>2</sup> See [http://transition.fcc.gov/Daily\\_Releases/Daily\\_Business/2014/db1112/DOC-330453A1.pdf](http://transition.fcc.gov/Daily_Releases/Daily_Business/2014/db1112/DOC-330453A1.pdf) (last visited Nov. 16, 2014).

<sup>3</sup> See <http://www.aei.org/events/reforming-lifeline-broadband-era/> (last visited Nov. 16, 2014).

Marlene Dortch, Secretary  
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broadband services affordable for low-income Americans. The speech raises many important questions and issues that should be considered as part of a further notice of proposed rulemaking as well as in the context of the Communications Act update underway in Congress.

Among those questions is whether wireless Lifeline eligible telecommunications carriers (“ETCs”) can include broadband in their popular “free” or no cost to consumer offerings, based on the current \$9.25 subsidy. In exploring this issue, the Commission will have to consider the impact proposals will have on program participation by consumers and service providers. Wireless ETCs successfully removed a significant barrier to consumers with their “free” service offerings and the result was a positive and meaningful increase in program participation. The Commission also must be mindful that a program that favors large providers or those with the most expansive retail presence may effectively limit competition and eventually result in less innovation and service to consumers.

The Commission also must assess proposed program administration changes carefully in terms of practicality. In 2012, the Commission acted to take the eligibility determination out of the hands of ETCs.<sup>4</sup> However, the Commission’s 2012 Lifeline Reform Order mandate to develop a national eligibility database remains unrealized nearly a year after it was set to be completed. New proposals, including those that contemplate more complicated interaction with other federal benefit programs, should be assessed with this experience in mind.

New administrative proposals also must be assessed based on their costs. According to the 2013 USAC Annual Report, the percentage of USAC administrative expenses divided by total USF program disbursements was 1.29 percent.<sup>5</sup> By comparison, the Supplemental Nutrition Assistance Program (“SNAP”) utilizes government entities to determine applicant eligibility and annual administrative costs are approximately 9 percent (about \$7 billion) of benefits paid.<sup>6</sup> While

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<sup>4</sup> See *Lifeline and Link Up Reform and Modernization, Lifeline and Link Up, Federal-State Joint Board on Universal Service, Advancing Broadband Availability Through Digital Literacy Training*, WC Docket No. 11-42, WC Docket No. 03-109, CC Docket No. 96-45, WC Docket No. 12-23, Report and Order and Further Notice of Proposed Rulemaking, FCC 12-11, ¶ 403 (rel. Feb. 6, 2012).

<sup>5</sup> See USAC 2013 Annual Report at 5, available at <http://www.usac.org/about/tools/publications/annual-reports/default.aspx> (last visited Nov. 17, 2014).

<sup>6</sup> See Food and Nutrition Service, Supplemental Nutrition Assistance Program, Program Accountability and Administration Division, *State Activity Report, Fiscal Year 2013* at 2 (July 2014), available at <http://www.fns.usda.gov/sites/default/files/snap/2013-state-activity.pdf> (last visited Nov. 17, 2014) (showing total issuance of just over \$76 billion and just under \$7 billion in total costs).

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the administrative costs for the entire USF were \$107 million in 2013, administrative costs for Lifeline would be \$162 million at 9 percent of total disbursements (\$1.8 billion in 2013).

The Commission also must assess the potential impact of coordination with other federal benefit programs based on the Lifeline program's participation rate and overall program costs. Lifeline is dramatically undersubscribed by comparison to many other federal benefits programs. Coordinated enrollment could result in a dramatic increase in program participation and corresponding costs. Because Lifeline is the Commission's only means-tested USF program, these issues require careful consideration. While it is undesirable to defer broadband funding for certain high cost locations and E-rate applicants, it is unacceptable to deny Lifeline service to an eligible consumer.

As part of its Lifeline modernization effort, the Commission should recognize that ETCs are a valuable part of the Lifeline ecosystem. The ETC designation process results in a degree of control and accountability that would not be present in a system with service providers freed from ETC market entry and oversight requirements. To achieve greater program participation, the Commission can and should streamline its own ETC designation process and set guidelines for the states. Additional actions can be taken to even-out and reduce regulatory burdens for ETCs while making sure that markets and consumers pick winners and losers (rather than regulators). Rationalization of the current framework will be an essential element of the Lifeline program's move to broadband. Businesses require predictability and certainty. With broadband capable smartphones being more costly than the handsets they will replace, the Commission must establish a regulatory framework that provides the predictability and certainty necessary for ETCs to invest and put broadband capable devices in the hands of consumers.

The Coalition stands ready to discuss Commissioner Clyburn's proposals and others with the Bureau in any context. There are many questions to be answered and we applaud Commissioner Clyburn for starting the process. The successful transition of the Lifeline program to broadband will require a tremendous focus on the details and collaboration among all stakeholders.

While moving the Lifeline program to broadband is both exciting and essential, there is much unfinished work to be done related to today's program. Accordingly, the Coalition members also discussed: (1) the efforts of the Lifeline Connects Coalition to protect and defend the Lifeline program at the Commission, in the media and on Capitol Hill; (2) the reform proposals of the Lifeline Reform 2.0 Coalition, including minimum requirements for state eligibility databases, retention of proof of eligibility and a "shot clock" for Bureau and Commission review and approval of pending items; (3) matters of importance to the Bureau, or pending or soon to be pending before the Bureau, including federal ETC petitions, the Lifeline Notices of Apparent Liability for alleged intra-company duplicates, In-Depth Validation appeals, and USAC Payment Quality Assurance ("PQA") appeals; (4) compliance plan modifications and Lifeline industry consolidation under the

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Bureau's July Public Notice;<sup>7</sup> and (5) support for the TracFone Petition for Rulemaking and for Interim Relief proposing to count Lifeline subscriber text messaging as "use" of the Lifeline service for purposes of the 60-day non-usage rule,<sup>8</sup> as well as counting data usage as "use" pursuant to the rules.

Pursuant to Section 1.1206(b) of the Commission's rules, this letter is being filed electronically.

Respectfully submitted,



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*Counsel for Lifeline Connects Coalition*

cc: Ryan Palmer  
Jonathan Lechter  
Melanie Tiano

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<sup>7</sup> See *Wireline Competition Bureau Reminds Carriers of Eligible Telecommunications Carrier Designation and Compliance Plan Approval Requirements for Receipt of Federal Lifeline Universal Service Support*, WC Docket Nos. 09-197, 11-42, Public Notice, DA 14-1052 (rel. July 24, 2014).

<sup>8</sup> See TracFone Petition for Rulemaking and For Interim Relief, WC Docket No. 11-42 (filed Oct. 1, 2014).





REAL FAMILIES  
REAL STORIES  
REAL LIFELINE

[lifelineconnects.org](http://lifelineconnects.org)

# JOBS



"I was in desperate need of a phone and on the job hunt fiercely. Well my first interview I gave the receptionist my phone number and although I didn't get the job I got another interview and they were able to call me because of my new phone thanks to StandUP."



-Lillian W.



"Without my phone I could not make the phone calls to inquire about employment. I just received a call about an hour ago from an employer to schedule me for an interview. Without this phone that would not have been possible."

- Edward B. (Chicago, IL)



"I got laid off from my job and have been looking for employment for the past 7 months. I need to have a phone where potential employers can contact me."

-Tara G., Kentucky



"I used to work in a beauty shop, but I couldn't afford the rent any longer so now I cut hair out of my apartment. My clients need a way to contact me to schedule appointments. I rely on my Lifeline phone so that they can reach me. If they call and I'm not available, they'll go somewhere else."

--Charlene P., Indiana



# SAFETY



"My kids and I were home alone one day and a young man started banging and kicking at my door and windows. He was screaming, "Let me in now!" My kids were scared, crying and upset because he would not stop or go away. I called 911. The police arrived and chased him away. Having my Life Wireless cell phone gives me a sense of comfort and security because I know I will be able to use it to call for help if I need to in the future."

- Amber M. (Saginaw, MI)



I am a domestic violence survivor and I am starting my life over with my two children. I currently have two jobs and pay rent and childcare expenses myself. I feel this phone will help me a lot. Thank you.

-Gekiya M.



"This phone has saved my life. I am a single mother of three and going to college. Within 48 hours of receiving this phone, I was assaulted. Had I not received this phone I would have never been in the position call 911. There was no one around at the time to help me. I am very grateful for the person at the tent who helped me get this phone. I went back to the tent a few days after my assault and thanked the agent for saving my life."

- Maria R. (Chicago, IL)



"I am a recovering addict. Me getting this phone and Lifeline service is going to be a fresh start of a new real life. Having this new phone will be the 1st thing that I will use to start my new life. Thank you so much!"

- Jenifer T. (Oklahoma City, OK)





# VETERANS



"I'm a young Army veteran and a single father. I joined the service when I was 19 as a way to provide for my family. I've served for 6 years including tours in South Korea, Japan, Germany and Afghanistan. I income-qualify for Lifeline service. Since returning home, I've settled in a remote area of Nevada. I find occasional work as a freelance mechanic, but am struggling to find full-time employment. I use my Lifeline phone on my resume when applying for jobs and as a way to keep in touch with my family members that live far away."

-Brian S., Nevada

access **WIRELESS.**



"I became homeless and am now living in a shelter My StandUP Wireless phone has helped me keep in touch with my family during a current time of personal crisis. It has helped them to know that I am in a safe place.

My StandUP phone has helped me keep doctor's appointments at the local Veteran's Association facility and it has helped me to have a phone to receive calls for future employment. Without the StandUP phone I'd have no way of communicating with anyone and therefore get out of this personal crisis.

Thank you for being there for me! "

- Regina F.



# FAMILY



Meet Aesha M. from Broken Arrow, Oklahoma. Aesha is a single mom of one with another child on the way. She was in need of a phone to get in contact with her doctors and family during her pregnancy. She was very thankful for our help and told me that having Lifeline service would help her out tremendously in this time of need.



"I have three young children and need to provide their schools with an emergency contact number in case they need to reach me. My Lifeline phone gives me peace of mind knowing that I can be reached if anything happens to one of them."

-Darnique J., Ohio



"I don't want to have to rely on this service, but for now anything that can help us save money is a lifesaver. We just moved to Cincinnati from Missouri to live with my Dad. I'm trying to find a job so that we can save some money to find a place of our own. My kids qualify for Medicaid, so I can use this phone to make their doctor's appointments."

--Stephanie F., Kentucky



"Thank you for connecting our residents to Life Wireless' cell phone program. It may seem like such a simple thing to be able to place and receive calls, but when you are homeless and desperately trying to stabilize your family's life, having access to a reliable phone service is essential. Thank you so much for partnering with us to support these women."

- Julianna Janssen, Ascension Place (Minneapolis, MN)



## FAMILY



"I am a single Mom with three kids. My ex-husband does not pay child support and I am solely responsible for taking care of our children. I clean houses and offices to make a living, but I need to know where my kids are and that they are okay when I'm working."

-Samantha L., Ohio

access **WIRELESS**

## SENIORS



"I am 77 years old. I am so thankful for this phone and Lifeline services because it will give my family peace of mind. I have had 7 heart attacks and have seven stints. Needless to say my family is concerned about me. I am glad to have this phone because my family can now have peace of mind knowing that they can get in contact with me and that I have a way to call in case of an emergency. Lifeline service means peace of mind to my family and I."

Edwina Neadeau



"I became a StandUp customer in February of 2013. I am delighted with the service. My two grandsons have asthma. More than once the pre-K or elementary school has called me on my StandUp phone to alert me that the asthma was acting up so I could take them home to their machine that provides breathing treatments. That would not have been possible in the year before receiving my Lifeline phone as I did not have phone service."

-Susan B.



"I use my lifeline to make doctor appointments and to help with my 78 year old grandmother who suffers from arthritis. She fell just the other day and she was able to call me on my phone so that I could come over and help her get back up."

- Shandia S. (Saginaw, MI)